



MEMO ENDORSED

Matthew G. Miller | Partner
Direct 646.292.8727 | mmiller@goldbergsegalla.com

June 15, 2021

VIA ECF

Honorable Judge Ona T. Wang
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Application denied without prejudice. Parties are directed to abide by Section I.e. of my Individual Practices. Further, the renewed application shall include deposition dates for the Court to so-order. The Clerk of Court is directed to close ECF 44 & 46. SO ORDERED.

/s/ Ona T. Wang June 16, 2021
U.S.M.J.

Re: **Matter 1: Hartford Fire Insurance Company a/s/o Smith Affliates Management Corp., d/b/a Samco Properties v. Broan-Nutone, LLC**
Docket No.: 1:20-cv-01292
Matter 2: Hartford Fire Insurance Company a/s/o TCC Group, Inc., v. Broan-Nutone, LLC
Docket No.: 1:20-cv-01292 (formerly 1:20-cv-03184)

Your Honor:

This firm represents the Defendant, Broan-Nutone, LLC, (hereinafter “Defendant”) in the above consolidated matter. With the consent of my adversaries, I am writing on behalf of all parties to request a 30-day adjournment of the settlement conference and a 60-day extension of the deposition deadline in this matter. The parties believe this brief extension will facilitate a more meaningful settlement conference in late July.

More specifically, it should be noted that plaintiffs have made settlement demands to Defendant. In considering those demands, it was discovered that a number of documents were inadvertently left out of plaintiffs’ document productions. Those documents are necessary to intelligently respond to plaintiffs demands and engage in a meaningful settlement conference. The parties are working cooperatively to exchange those documents, which we believe will be completed in the next week. Moreover, the parties have noticed a number of depositions for mid-July, and, if this extension is granted, will complete the remaining depositions in during the remainder of fact discovery. The parties are hopeful to have a majority of the depositions completed in July, but respectfully request until the end to September to complete depositions due to summer schedules.

The parties are available at Your Honor’s convenience to further discuss this issue. Thank you for Your Honor’s courtesy in this matter.

Please send mail to our scanning center at: PO Box 580, Buffalo, NY 14201

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Respectfully submitted,



Matthew G. Miller

CPM/tm

cc: All counsel of record